

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs and Counterclaim Defendants,

- against -

MUFG UNION BANK, N.A. and GLAS
AMERICAS LLC,

Defendants and Counterclaim Plaintiffs.

No. 19 Civ. 10023 (KPF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declarations of Andrew N. Rosenberg and Jonathan H. Hurwitz, the exhibits attached thereto, and the accompanying Memorandum of Law, Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. (the “Trustee”)¹ and GLAS Americas LLC (the “Collateral Agent”), hereby move this Court pursuant to Federal Rule of Civil Procedure 62(b), before the Honorable Katherine Polk Failla, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Courtroom 618, New York, New York 10007, for an order modifying the partial stay of execution of enforcement entered on December 29, 2020 (ECF No. 241).

¹ The Trustee, MUFG Union Bank, N.A., merged into U.S. Bank National Association, effective May 26, 2023, with U.S. Bank National Association as the surviving entity.

Dated: New York, New York
June 28, 2023

Respectfully submitted,

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Counterclaim Plaintiffs MUFG Union
Bank, N.A. and GLAS Americas LLC, in
their respective capacities as Trustee
and Collateral Agent, under the
Indenture dated October 27, 2016, and
the Pledge and Security Agreement
dated October 28, 2016, governing
PDVSA's Senior Secured Notes due
2020*

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Plaintiffs MUFG Union Bank, N.A. and
GLAS Americas LLC, in their respective
capacities as Trustee and Collateral Agent,
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(as to Federal and New York law
issues only)*